

November 4, 2004

FILED ELECTRONICALLY

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: CS Docket No. 98-120; MB Docket No. 03-15**

Dear Ms. Dortch:

The undersigned members of the boards of the CBS and NBC affiliate associations as representatives of their respective broadcast companies submit this letter to add their wholehearted support to the plan to complete the digital transition filed by the National Association of Broadcasters; the Association for Maximum Service Television; the ABC, CBS, Fox and NBC television network affiliate associations; the ABC television network; ABC's owned television stations and 17 television station groups on October 29, 2004. Bringing the digital transition to an end while also protecting the interests of consumers is critical if broadcasters are to continue to carry out their longstanding and historic mission of serving the needs and interests of their viewers.

The strength of the broadcasters' proposal is that it gives both over-the-air broadcasters and cable companies a comparable stake in the DTV transition, rather than placing all responsibility on broadcasters to the detriment of consumers. The digital transition is an industry-based transition, and with close to 70 percent of American households subscribing to cable, the broadcast and cable industries should be working together to bring it to a swift conclusion without disenfranchising viewers -- both analog viewers who would otherwise lose service because they cannot receive over-the-air digital signals and digital viewers who otherwise would be deprived of receiving all of a broadcaster's free digital content, including high-definition digital content, via cable.

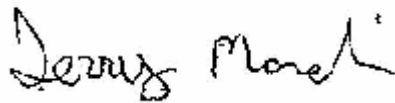
Cable operators may at first object to the broadcasters' proposal because it would require cable systems, post-transition, either to downconvert at the home or to transmit from the headend a digital signal in digital format plus a digital signal downconverted to analog format. However, major cable companies are already rolling out plans to install downconverters in subscribers' homes. They have an incentive to do so because downconverting a digital signal at the home requires only 3 MHz of cable system capacity and is therefore more efficient than downconverting digital signals at the headend, which takes up 6 MHz. The appeal of the broadcasters' proposal is that it leaves to cable systems the timing of the installation of in-home

downconverters while still assuring that consumers with digital sets receive digital services and consumers with analog sets continue to receive service.

The broadcasters' proposal will thus benefit cable, broadcasters and most importantly, consumers, and the undersigned therefore urge the Commission to adopt it promptly.

Respectfully submitted,

Broadcast Companies Represented on  
the Board of the NBC Television  
Affiliates



Terry Mackin  
Hearst-Argyle Television, Inc.

Dave Lougee  
Belo Corp.

Terry Hurley  
Cordillera Communications

Michael Fiorile  
Dispatch Broadcast Group

Ray Schonbak  
Emmis Communications

Jim Prather  
Journal Broadcast Group

Lon Lee  
KHQ, Incorporated

Steve Langford  
Liberty Corporation

Marci Burdick  
Schurz Communications

Broadcast Companies Represented on  
the Board of the CBS Television  
Network Affiliates Association



Bob Lee  
WDBJ Television, Inc.

Monty Wallis  
Cordillera Communications

Tom Griesdorn  
Dispatch Broadcast Group

Ken Messer  
Ben Tucker  
Fisher Broadcasting Company

Larry Beaulieu  
Doreen Wade  
Freedom Broadcasting, Inc.

Craig Dubow  
Gannett Broadcasting Company

Paul Fredericksen  
Hearst-Argyle Television, Inc.

Jack D. Dempsey  
Media General Broadcast Group

Scott Blumenthal  
Paul Karpowicz  
LIN Television Corporation

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Mike Carson  
Sunbeam Television Corp.

Stuart T. Martin  
Mt. Mansfield Television, Inc.

Ralph Toddre  
Sunbelt Communications Company

Bob Eoff  
New York Times Broadcasting Group

Tim Busch  
Nexstar Broadcasting Group

Bill Applegate  
Raycom Media, Inc.

cc: Chairman Michael Powell  
Commissioner Kathleen Abernathy  
Commissioner Michael Copps  
Commissioner Kevin Martin  
Commissioner Jonathan Adelstein  
Mr. Bryan Tramont  
Mr. Jonathan Cody  
Ms. Stacy Fuller  
Mr. Jordan Goldstein  
Ms. Elizabeth Andrion  
Ms. Johanna Shelton  
Mr. Kenneth Ferree  
Mr. Rick Chessen